



38302

Supplier Principles & Ethics

1.0 Introduction

At **RPM-PSI, Inc.**, we are concerned as to what best practices we expect from our trusted & valued suppliers and their supply chain to reflect the standards we hold for ourselves. From information security and protecting the environment, to anti-corruption and upholding human rights, we desire our trusted & valued suppliers to join us and our customers in working as sustainably and ethically as we can. Our ambition is to be responsible and sustainable for our customers and the communities we operate in. We cannot accomplish this alone, therefore it is important that we team up with our trusted & valued suppliers to make a positive business difference over the long term.

We may periodically update our valued supplier principles to reflect industry updates and changes in laws and regulations as necessary, and to incorporate issues that are important to us.

2.0 Supplier due diligence

Risk-based due diligence begins for all sub parties with whom we engage as a supplier, adviser, or other supporting associate. As necessary, this may include obtaining the identity of the third party, so as to establish ownership and sufficient information as to ethics (in order to assess relevant bribery and corruption risks). At the contracting stage we convey our expectation (as herein) that our trusted & valued suppliers embrace the standards on ethical behavior, per **RPM-PSI, Inc.**, and or our valued customer's requirements.

Once an **RPM-PSI, Inc.**, supplier has been approved and a purchase order contract has been signed, we'll continue to manage and monitor the supplier during the contract, and includes managing any significant changes in our association while undertaking ongoing risk-based due diligence. While in such a relationship as an **RPM-PSI, Inc.**, valued supplier, we occasionally raise awareness of and engage them as such herein.

3.0 RPM-PSI, Inc.'s principles & ethics

3.1.1 Human Trafficking

RPM-PSI, Inc., require our trusted & valued suppliers to not engage in the use of human trafficking as forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation, including Forced, or Indentured Child Labor

3.1.2 Human Rights

RPM-PSI, Inc., require our trusted & valued suppliers to preserve and protect human rights by treating their own employees with respect, sponsoring fair employment practices, providing fair and competitive wage compensation and prohibiting bullying, discrimination, harassment, retaliation, modern slavery and human trafficking.

Our trusted & valued suppliers are expected to undertake appropriate due diligence to identify such human rights risks, supported by systems and processes to minimize the risk of such abuses occurring.



38302

Supplier Principles & Ethics

3.1.3 Diversity and inclusion

RPM-PSI, Inc., expects our trusted & valued suppliers to promote a diverse and inclusive work environment where every employee, customer, supplier and partner is treated with dignity, respect and fairness, as well as to provide equal employment opportunities without discrimination and to comply with all applicable non-discrimination laws and regulations.

3.1.4 Wages, benefits, and working hours

RPM-PSI, Inc., expects our trusted & valued suppliers to provide workers at least the minimum compensation, insurance and all applicable legally mandated benefits as defined by local law and regulation, as well as providing employees with regulated rest periods per hours of by work, by week and by day with any appropriate annual leave in accordance with applicable laws and regulations

3.1.5 Health and safety

RPM-PSI, Inc., expects our trusted & valued suppliers to create an appropriate plan of safety management, with policies aimed at eliminating fatalities, work-related injuries, health impairment, addressing safety hazards, with the objective with protecting the health, safety, and welfare of employees, contractors, visitors and others who may be affected by their activities.

3.1.6 Support without retaliation

RPM-PSI, Inc., our trusted & valued suppliers are expected to provide their employees and supporting third parties the access to adequate reporting channels so as to seek advice, or raise legal or ethical concerns, without fear of retaliation, including opportunities for anonymous reporting.

3.2 Business Practices

3.2.1 Code of Conduct and compliance

RPM-PSI, Inc., needs our trusted & valued suppliers to create and apply as well as adhere to their own similar written code of conduct. In addition, as appropriate with the size and nature of their business, **RPM-PSI, Inc.**, expect our trusted & valued suppliers to have management systems in place to support compliance with all applicable laws and regulations.

3.2.2 Anti-Corruption

RPM-PSI, Inc., has a zero-tolerance policy for corruption, and prohibit anyone conducting business on our behalf, including our trusted & valued suppliers, from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons.

3.2.3 Gifts & business courtesies

RPM-PSI, Inc., competes on the virtues of our products and services and do not use the exchange of business courtesies to gain an unfair competitive advantage. **RPM-PSI, Inc.**, requires the same of our trusted



38302

Supplier Principles & Ethics

& valued suppliers in the offering or receipt of any gift or business courtesy, including cash and cash equivalents.

3.2.4 Anti-Trust and competition

RPM-PSI, Inc., has the expectation that our trusted & valued suppliers will conduct business in accordance with all applicable competition and anti-trust laws and regulations. **RPM-PSI, Inc.**, requires that our trusted & valued suppliers will not inappropriately enter into official or unofficial anti-competitive arrangements, such as allocate or control markets, fix prices, limit supply, rig bids, or otherwise improperly restrict competition.

3.2.5 Risk management

RPM-PSI, Inc., our trusted & valued suppliers are invigorated to address supply risks via the appropriate actions of proactively managing and mitigating risks, within their supply chain and where else appropriate, and to report impacting risk issues to **RPM-PSI, Inc.**, in a timely fashion, while ensuring that those risks are appropriately being mitigated.

3.2.6 Accurate records

RPM-PSI, Inc., requires our trusted & valued suppliers to accurately create, capture, store, secure and retain business records, as appropriate.

3.2.7 Timely payments

RPM-PSI, Inc., requires our trusted & valued suppliers to treat their trusted & valued suppliers accordingly and pay their suppliers on time in accordance with agreed contractual payment terms.

3.2.8 Proper payment of taxes

RPM-PSI, Inc., necessitates that our valued & trusted suppliers to properly and accurately record all financial aspects of their work, and to represent themselves accurately to all relevant tax authorities in ensuring that appropriate processes are in place to prevent the facilitation of tax evasion by supporting elements including employees and other persons performing services on behalf of our trusted & valued suppliers.

3.2.9 Conflicts of interest

RPM-PSI, Inc., has the expectation that our trusted & valued suppliers identify and avoid actual, potential, or perceived conflicts of interest in their dealings with **RPM-PSI, Inc.**, and or our valued customers. We at **RPM-PSI, Inc.**, understand that actual or potential conflicts can arise from time to time in the course of business. In such cases, we rely upon our valued & trusted suppliers to disclose such conflicts to **RPM-PSI, Inc.**, and all other affected parties in a most timely fashion.

3.2.10 Trade controls

RPM-PSI, Inc.'s trusted & valued suppliers, as relevant, are required to conduct business in compliance with all applicable laws and regulations governing export, re-export, transfer and import of controlled hardware, technical data, software and services. As such, it is expected our affected suppliers screen third parties, with whom they do business, and to be fully compliant with all relevant financial sanctions, trade embargoes and other restrictive measures imposed by any applicable government authority.



38302

Supplier Principles & Ethics

3.2.11 Product quality

RPM-PSI, Inc., has the expectation that our valued supporting our trusted & valued suppliers have integrity, supports **RPM-PSI, Inc.**, commitment to continuous improvement, and to create a zero-defect culture by manufacturing high-quality, reliable products on time and at an affordable price.

3.2.12 Counterfeit parts & goods

RPM-PSI, Inc., requires that our trusted & valued suppliers develop, implement, and maintain methods and processes, as appropriate to their products and services, to minimize the risk of counterfeit parts and materials integrations within deliverable products. Effective processes should be in place to detect, report and quarantine counterfeit parts, materials, and goods, in addition to preventing such items or their attributes (including packages, labeling and data) from re-entering the supply chain.

RPM-PSI, Inc., mandates that our trusted & valued suppliers use **only** parts from Original Equipment (OEM) or Component Manufacturers (OCM) or their Authorized Franchised Distributors (AFDs), and to maintain compliance with applicable laws, regulations, and industry ‘best practice’ protocols when conducting business with **RPM-PSI, Inc.**, and our valued customers.

RPM-PSI, Inc., insists that trusted & valued suppliers to inform us immediately if any counterfeit parts, materials and or goods are detected or suspected as integrated in products provided.

3.2.13 Information security

RPM-PSI, Inc., supports our trusted & valued suppliers with the necessary requirements to develop, implement and maintain appropriate security measures to protect the information (including confidential, proprietary, personal export controlled, government security classified and controlled unclassified information) that they create, collect, handle, store or are responsible for, in accordance with applicable laws, regulations and contractual requirements, regardless of whether such information belongs to our valued supplier, RPM-PSI, Inc. and/or our mutually valued customers. As such **RPM-PSI, Inc.**, depends upon our supplier’s cooperation with addressing any security issues proactively and to support and notify **RPM-PSI, Inc.**, and the appropriate authorities as appropriate / required, in responding to and correcting any security breaches.

3.2.14 Property

RPM-PSI, Inc., requires our trusted & valued suppliers to comply with applicable regulations and flow-downs governing property (parts, materials and equipment), with securing from incident inappropriate use, application, and or its loss, including that which is procured or produced by the supplier.

3.2.15 Intellectual property

RPM-PSI, Inc., **appreciates mutual respect**; and we expect our trusted & valued suppliers to comply with all applicable laws and regulations governing intellectual property, as well as all contractual obligations.

3.3 Sustainability

Sustainability is a key focus with the mitigation of climate change impacts with growth and prosperity. Our supply chain sustainability plan incorporates the following priorities of environment and conflict materials.

38302

Supplier Principles & Ethics**3.3.1 Environment**

RPM-PSI, Inc., envisions & supports our trusted & valued suppliers to operate in a fashion that actively manages risk, conserves natural resources, and protects the environment. **RPM-PSI, Inc.**, supports & encourages our trusted & valued suppliers to apply a management system of principles of environmental control in order to establish a logical approach to the management of risks and hazards, with identifying opportunities associated with the environment, including potential risk from regulatory noncompliance. **RPM-PSI Inc.** trusted & valued suppliers are also expected to comply with applicable laws and regulations regarding the environment and to conduct their business in a manner that actively manages environmental risks.

3.3.2 Conflict materials

RPM-PSI, Inc., requires that, as applicable to our trusted & valued suppliers, that they determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

- <https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>

4.0 CUSTOMER LINKS

- BAE Systems
 - www.safecall.co.uk/baeplc or ethics.helpline@baesystems.com
- Boeing
 - https://www.boeingsuppliers.com/supplier_principles.html
- CACI
 - <https://www.caci.com/partners>
- Leonardo DRS
 - <https://www.leonardodrs.com/who-we-are/our-commitment/ethics/>
- General Atomics
 - <https://www.ga-asi.com/suppliers/supplier-code-of-conduct>
- L3 Harris
 - <https://www.l3harris.com/sites/default/files/2020-08/l3harris-code-of-conduct.pdf>
 - <https://www.l3harris.com/company/environmental-social-and-governance>
- Leidos
 - <https://www.leidos.com/suppliers>
- Lockheed Martin
 - <https://www.lockheedmartin.com/en-us/suppliers/supplier-ethics.html>
- Northrop Grumman
 - <https://www.northropgrumman.com/suppliers/doing-business-with-northrop-grumman/northrop-grumman-standards-of-business-conduct-for-suppliers-and-other-trading-partners/>
- Raytheon
 - <https://www.rtx.com/suppliers>
- Scientific Research Corporation (SRC)
 - <https://www.scires.com/Who-We-Are/Missions-Values>



38302

Supplier Principles & Ethics

- Sierra Nevada Corporation
 - <https://www.sncorp.com/suppliers/doing-business-with-snc/>
- Ultra (UEOS)
 - <https://www.ultra.group/us/about-us/responsibility/business-integrity/>
- U.S. Government
 - <https://www.acquisition.gov/far/52.203-13>
- U.S. Navy
 - <https://www.navsup.navy.mil/ethics/>